

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re *Ex Parte* Application of

Clara Moussa Boustany,

Applicant,

for an Order Pursuant to 28 U.S.C. § 1782
Granting Leave to Obtain Discovery for Use
in a Foreign Proceeding

Case No. 1:23-mc-27

***EX PARTE* APPLICATION FOR AN ORDER UNDER 28 U.S.C. § 1782
TO OBTAIN DISCOVERY FOR USE IN A FOREIGN PROCEEDING**

Pursuant to 28 U.S.C. § 1782 and Rules 26 and 45 of the Federal Rules of Civil Procedure, Applicant Clara Moussa Boustany hereby moves *ex parte* for an order granting her leave to conduct discovery for use in pending legal proceedings in Monaco. This application is supported by the accompanying Memorandum of Law, along with the declarations of Moussa Boustany and Sarah Filippi (Moussa Boustany's counsel in the Monaco proceedings) and the exhibits annexed thereto.

As set forth in the accompanying documents, this application is brought on the grounds that (1) the discovery sought is for use in a pending foreign proceeding; (2) the discovery is sought from parties who are found in this district; and (3) the application is made by an interested party. Thus, the application satisfies the requirements of 28 U.S.C. § 1782.

Therefore, Moussa Boustany respectfully requests that the Court enter an order authorizing her to obtain discovery from Stephen Valkenborg and Makram Abboud under 28 U.S.C. § 1782 by serving the subpoenas attached as Exhibits A and B hereto.

Dated: New York, New York
January 30, 2023

Respectfully submitted,

LUPKIN PLLC

By: /s/ Michael B. Smith
Jonathan D. Lupkin
Michael B. Smith

80 Broad Street, Suite 1301
New York, NY 10004
Tel: (646) 367-2771
Fax: (646) 219-4870
jlupkin@lupkinpllc.com
msmith@lupkinpllc.com

Counsel for Clara Moussa Boustany

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